

OCT 13 2020

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Attorney for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF VENTURA

KELLY SHARP,

Plaintiff,

v.

COUNTY OF VENTURA; COUNTY OF
VENTURA SHERIFF'S DEPARTMENT;
CITY OF THOUSAND OAKS; and DOES
1 through 20, Inclusive,

Defendants.

CASE NO.

COMPLAINT FOR ASSAULT AND
BATTERY

COMES NOW plaintiff and complains of defendants and each of them, and for cause
of action alleges as follows:

FIRST CAUSE OF ACTION FOR ASSAULT AND BATTERY

AGAINST ALL DEFENDANTS

1. That all acts herein complained of occurred at 5814 Hickory Drive, #B, Oak
Park, California 91377.

2. That the true names or capacities, whether individual, corporate, associate or
otherwise, of defendants DOES 1 through 10, Inclusive, are unknown to plaintiff at this
time, and plaintiff therefore sues said defendants by such fictitious names; when the true
names and capacities of defendants are ascertained, plaintiff will amend this Complaint
accordingly.

JF

1 3. Plaintiff is informed and believes, and thereon alleges, that each of the
2 defendants designated herein as a DOE is responsible in some manner for the events that
3 happened hereto, and caused injuries and damages proximately thereby to plaintiff as herein
4 alleged.

5 4. That defendants DOES 1 through 20, inclusive, were employees or agents of
6 each of the defendants named herein and, as such, responsible for injuries and damages
7 suffered by plaintiff.

8 5. That on or about April 23, 2020, plaintiff was working in a garage at 5814
9 Hickory Drive, #B, Oak Park, California.

10 6. That on or about April 23, 2020, plaintiff was assaulted and battered by
11 employees of defendants, and each of them, without cause or provocation and caused serious
12 injuries and damages as herein alleged. Said act constituted assault and battery upon
13 plaintiff.

14 7. The aforementioned acts and omissions of defendants, and each of them,
15 were done by defendants intentionally and therefore plaintiff claims exemplary and punitive
16 damages in an amount to be proved at trial.

17 8. Pursuant to the Government Code, plaintiff has filed claims against the City
18 of Thousand Oaks, County of Ventura, and County of Ventura Sheriff's Department.
19 Plaintiff has received notice from the County of Ventura that the claim presented to the City
20 of Thousand Oaks was rejected.

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22 WHEREFORE, plaintiff prays for judgment against defendants and each of them, as
23 follows:


- 24 1. For general damages according to proof;
- 25 2. For medical expenses according to proof;
- 26 3. For economic damages according to proof;
- 27 4. For punitive damages according to proof;
- 28 5. For costs of suit incurred herein; and

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6. For such other and further relief as this Court may deem just and proper.

DATED: October 2, 2020

LAW OFFICES OF BARRY S. ZELNER

By 
Barry S. Zelner
Attorney for Plaintiff